## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS

NOV 0 7 2022

SHANNON MARK DOUTHIT §

Nathan Ochsner, Clerk of Court

V.

§ Case Number 4:19-cv-01712

BRYAN COLLIER, et al

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## MOTION FOR APPOINTMENT OF COUNSEL

Plaintiff, Shannon Mark Douthit, TDCJ #453033, pursuant to § 1915, requests this Court to appoint counsel to represent him in this case for the following reasons:

- 1. The Plaintiff is unable to afford counsel.
- 2. The Issues involved in this case are complex.
- 3. The Fifth Circuit Court of Appeals No. 20-20550 vacated this Court's Judgment as to Plaintiff's shake-down related ADA claims against defendants other than Bryan Collier and Herrera, and remanded for further proceedings.
- 4. It is these further proceedings that Plaintiff needs counsel.
- 5. Plaintiff has a low IQ.
- 6. Legal books are in the process of being removed from the law Library at the Pack 1 Unit because inmates are going to be provided tablets at some time in the future, and the few existing books are outdated.
- 7. Plaintiff has limited knowledge of law because he is a layman.

## DECLARATION

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signed this 3rd day of November 2022. Mannan Mag

Shannan Mark Douthit

PRAYER

Wherefore, Plaintiff asks this Honorable Court to appoint counsel to represent the plaintiff...

Date: 11-3-2022

Shannon Mark Douthit Plaintiff/Pro Se

## Shannon Douthit 453033 Pack 1 Unit 2400 Wallace Pack Rd. Navasota, TX 77868

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Date: November 3, 2022

Nathan Ochsner, Clerk of Court

Re: Shannon Mark Douthit V. Bryan Collier, et al case No. 4:19-cv-01712

Dear Clerk:

Please find enclosed Motion For Appointment of Counsel.

Please file and bring to the attention of the Court.
Your time and assistance is appreciated.

Sincerely,

Shannon Douthit

Shannon Douthit 453033 Pack 1 Unit 2400 Wallace Pack Rd. Navasota, TX 77868

NORTH HOUSTON TX 773

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